

# EXHIBIT A

**From:** [Watkins, Elijah M.](#)  
**To:** [ruth.hughs@kellyhart.com](mailto:ruth.hughs@kellyhart.com)  
**Cc:** [Olson, Wendy J.](#); [Rosenbaum, Laura E.](#); [Rasich, Marc](#); [Bieter, Mark L.](#); [Bibb, Hillary](#); [Franolich, Jackie](#); [Courtney Hostetler](#)  
**Subject:** Mi Familia Vota - SB 1 deposition schedule  
**Date:** Monday, March 21, 2022 12:06:00 PM  
**Attachments:** [image001.png](#)

---

Ms. Hughs

This firm represents Mi Familia Vota, one of several plaintiffs groups currently suing Texas over the SB 1 voting legislation. As the former Texas Secretary of State you have been identified as a necessary deponent. We'd like to schedule your deposition for a date that is most convenient for you and are targeting the first two weeks of April. Which day between April 4-15 works best for your schedule? Please also let us know if service via email will suffice for the subpoena or if you will require a process server to visit you at your home or place of work. And of course, if you are represented by counsel, please pass this message on to them.

Thanks very much for your prompt attention

**Elijah Watkins** | Partner

**STOEL RIVES LLP** | 101 S. Capitol Boulevard, Suite 1900 | Boise, ID 83702

Direct: (208) 387-4275 | Mobile: (208) 340-2341

[elijah.watkins@stoel.com](mailto:elijah.watkins@stoel.com) | [Bio](#) | [vCard](#) | [www.stoel.com](http://www.stoel.com)



This email may contain material that is confidential, privileged, and/or attorney work product for the sole use of the intended recipient. Any unauthorized review, use, or distribution is prohibited and may be unlawful.